REMARKS

Claims 1, 3-4, and 6-16 were previously pending in the present application. With this amendment, claim 14 has been amended to more narrowly and precisely identify the subject matter claimed. No new matter has been added.

SECTION 103 REJECTION

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Prabhakaran (U.S. Patent 5,904,727; hereafter, "Prabhakaran") in view of Chojnacki (U.S. Patent 6,366,851; hereafter, "Chojnacki"). Further, claims 3-4 and 6-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Prabhakaran in view of Chojnack, and further in view of Esposito (U.S. Patent 6,101,496; hereafter, "Esposito"). Applicant respectfully traverses these rejections as detailed with respect to individual claims below.

Claim 1

Regarding claim 1, the Office Action states that Prabhakaran teaches a computer identifying a centroid (col. 3, lines 31-47). The Office Action further indicates that Chojnack discloses defining radials extending from a centroid (col. 24, lines 52-67 and figs. 21C-21D) and associating at least one data item with each of the radials (col. 7, lines 19-57). The Office Action states it would be obvious to modify Prabhakaran to include Chojnacki to have a way to programmatically assign x and y coordinates to records for mapping data.

Initially, claim 1 claims a single centroid with a plurality of radials extending from the centroid. Chojnacki does not disclose multiple radials extending from a centroid. Instead, Chojnacki only discloses providing a single radial from the centroid identified. Chojnacki discloses (col. 24, lines 52-60 and fig. 21C) that starting with the proto-shape point 604, a curvature at the point is determined and then, a radial line through this curve is determined. Chojnacki further discloses (col. 24, lines 60-67 and fig. 21D) that using the shift distance, a new data point is determined at the shift distance from the proto-shape point along the radial line, and the coordinates of the new data point are then stored. Again, by contrast claim 1 claims a plurality of radials extending from said centroid. Accordingly claim 1 is believed allowable as nonobvious over Prabhakaran in view of Chojnacki.

The Office Action further suggests that Chojnacki discloses (col. 7, lines 19-57) associates at least one data item relating to the centroid with each of said plurality of radials, as claimed in claim 1. However, Chojnacki discloses (col. 7, lines 19-47) that shape point data are stored in the data record that represents the road segment. No indication is made that the data stored relates to the centroid in any way. In fact, Chojnacki does not appear to utilize the centroid once the data item location is determined and stored relating to the road. Accordingly claim 1 is further believed allowable as nonobvious over Prabhakaran in view of Chojnacki.

Claims 3 and 6

Regarding independent claims 3 and 6, the Office Action indicates that Prabhakaran and Chojnacki fail to teach, in a computer, identifying a centroid; defining a plurality of radials extending from said centroid; and associating at least one data item relating to said centroid with each of said plurality of radials. (Applicant notes that this is contrary to the indication regarding claim 1). The Office Action continues indicating, however, that Esposito teaches defining a plurality of radials extending from said centroid (col. 1, lines 46-66 and fig. 3-2, and col. 5, lines 15-57), along with the other elements of claims 3 and 6, and it would be obvious to combine Prabhakaran and Chojnacki with the teachings of Esposito in order to have geocoded OI records using current technology for various precision assignments. This rejection is respectfully traversed.

In contrast with the assertion of the Office Action, Esposito does not teach or disclose defining a plurality of radials extending from the centroid as claimed in its col. 1, lines 46-66, or col. 5 lines 15-57 as indicated by the Office Action, or elsewhere. Esposito instead discloses (in col. 1 line 46 through col. 2, line 44) a georeferenced library compiled from sources including US Zip Code centroids, and if a raw data address cannot be matched exactly to a specific library street address (as when a building is newly built and has no street address), then an attempt is made to match the raw data address to geographic library references such the closest Zip Code centroid it can find. No radials from a centroid are identified to reference multiple points to the centroid as claimed. To maintain a *prima facie* case of obvious, the combined references must disclose each element claimed. Without disclosure of defining radials extending from a centroid in any of the cited

references, claims 3 and 6 are believed allowable as non-obvious over Prabhakaran and Chojnacki in view of Esposito.

Claims 12 and 15

Regarding independent claims 12 and 15, the Office Action indicates that these claims, like claims 3 and 6 stand rejected over Prabhakaran and Chojnacki in view of Esposito. Claims 12 and 15 include elements similar to claims 3 and 6, and are believed allowable over Prabhakaran and Chojnacki in view of Esposito based at least on the arguments presented above with respect to claims 3 and 6.

Dependent Claims 4, 7-11, 13-14 and 16

Claims 4, 7-11, 13-14, and 16 each ultimately depend from one of the independent claims and are believed patentable for at least the same reasons as the independent claims and because of the additional limitations of these claims.

CONCLUSION

Based on the above remarks, all of pending claims 1, 3-4, and 6-16 are believed in condition for allowance. Accordingly, reconsideration and allowance of these claims is respectfully requested.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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